



ADMINISTRATIVE CENTER • 2000 M63 – MAIL DROP 3005 • BENTON HARBOR, MI 49022

May 25, 2005

Jonathan Passe
U.S. Environmental Protection Agency
501 Third Street, NW
Fourth Floor
Mail Code 6202J
Washington, DC 20001
passe.jonathan@epa.gov

Re: Whirlpool Corporation Comments on EPA's ENERGY STAR[®] Qualified Homes criteria

Dear Mr. Passe:

Whirlpool Corporation applauds the U.S. Environmental Protection Agency (EPA) recognition of the role of ENERGY STAR[®] qualified appliances in overall home efficiency. Appliances account for approximately 15% of the total home energy consumption, and when a home is built to ENERGY STAR[®] Homes qualifying levels, it is crucial that the role of appliances be considered. The proposed National Specifications for ENERGY STAR[®] Qualified Homes take the important first step toward mandating an appliance component. In grouping appliances with lighting fixtures and ceiling fans, however, it is possible that the criteria may fall short of meaningful home efficiency goals.

REQUEST: That kitchen and laundry appliances be separated from lighting fixtures and ceiling fans and either provided their own category or included in the water heater category

The current EPA proposed criteria require "Five or More ENERGY STAR[®] Qualified Light Fixtures, Ceiling Fans and/or Appliances." Whirlpool is concerned that builders will meet the minimum five-fixture requirement exclusively through lighting fixtures and ceiling fans because the cost to upgrade to an ENERGY STAR[®] lighting fixture is normally less than the cost to upgrade to an ENERGY STAR[®] appliance. We also believe that a category that includes water heaters and appliances would be 1) attractive to builders, 2) save more energy than a category linked with lighting fixtures, and 3) will better align the ENERGY STAR[®] Home program criteria with other green building programs across the nation.

Specifically, Whirlpool suggests a separate appliance category that includes dishwashers, clothes washers, refrigerators, and water heaters. The program criteria would then require installation of either three of the four appliances, or of an energy efficient water heater and a minimum of two ENERGY STAR qualified appliances, for a home to earn the ENERGY STAR.

Heather O. West • Director, Government Relations
1200 G Street NW, Suite 828 • Washington DC 20005-3820
Phone: (202) 434-8990 • Fax: (202) 434-8991

1) Upgrade cost will drive builders to purchase more lighting fixtures than appliances

Whirlpool is concerned that builders will meet the minimum five-fixture requirement exclusively through lighting fixtures and ceiling fans because it will be less costly to the builder to upgrade to an ENERGY STAR lighting fixture than to upgrade to an ENERGY STAR kitchen or laundry appliance. The average price increase from a regular lighting fixture to an ENERGY STAR qualified fixture is \$30-\$60. Price differentials also exist for appliances, with the most significant being the upgrade from a traditional top-load clothes washer to a horizontal access ENERGY STAR qualified model. The average sales value between the two platforms exceeds \$400. Preliminary data indicate that the refrigerator/freezer average sales value exceeds \$250. Whirlpool Corporation is able to offer more detailed information regarding price differentials, but not by the comment deadline. We can provide this information at a later time, if desired.

2) Water heaters, laundry and kitchen appliances make an attractive Builder Package

The revised appliance group will not detract builders from choosing energy water heaters in favor of only the laundry or kitchen products because the water heater works with the dishwasher and the clothes washer. This is a logical grouping to ensure greater energy efficiency in a home. Every house requires a new water heater, unlike with appliances where the buyers could bring old appliances from their previous homes. So, it is very likely that a builder will choose an energy efficient water heater and then supplement it with the kitchen and laundry appliances.

3) Energy Savings support a separate category

Given that appliances account for approximately 15% of the total home energy consumption, it is crucial that the role of appliances be emphasized in an ENERGY STAR home program. According to DOE data, the refrigerator alone can account for up to 10% of the average home utility bill costs, with other appliances and home electronics accounting for up to 32%. Comparatively, all lighting accounts for up to 6% of the typical home utility costs. Selecting ENERGY STAR qualified appliances during the home construction or remodel process positively impacts overall home energy consumption and associated costs.

4) The separate appliance category aligns with current and future green building emphasis

Currently the ENERGY STAR Homes program is a benchmark program toward which builders strive. However, the National Association of Home Builders' new Model Green Building Guidelines, designed for local/state homebuilder associations to implement with specific builder compliance guides, includes points for appliance energy and water efficiency. Similarly, the U.S. Green Building Council (USGBC) is about to release its Latent Energy Efficiency Determination – Residential (LEED-R) guidelines for mid-rise multifamily new construction, and the LEED-R program includes the use of ENERGY STAR qualified appliances.

Given the emphasis on including ENERGY STAR qualified appliances in other green building guidelines, Whirlpool encourages the EPA to revise the new ENERGY STAR Homes program criteria to include a separate category for ENERGY STAR qualified

appliances. Doing so will ensure that the program remains both relevant and the benchmark green building program.

Thank you for your consideration.

Sincerely,

Heather West

cc:

Tom Halford	Butch Gaudette	J.B. Hoyt
Guy Minnix	Tom Catania	Julie White